

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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May 30, 2023

**VIA ECF**

The Hon. Gabriel W. Gorenstein, U.S.M.J.  
United States District Court, Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

**MEMORANDUM ENDORSED**

Re: *Martinez Montoya v. Havana Central NY 2, LLC et al*  
**Case No.: 1:23-cv-00111-JLR-GWG**

Dear Honorable Judge Magistrate Gorenstein:

This law firm represents Plaintiff Senon Martinez Montoya (the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules 1(E)<sup>1</sup> and 1(F), this letter respectfully serves to request an adjournment of the June 1, 2023 telephonic conference to the following proposed date and time:

1. Thursday, June 29, 2023 at 3:30 p.m.

The basis of this request is that the undersigned will be traveling overseas from June 1, 2023, to, through and including, June 17, 2023, and will have extremely limited availability during this time.

This is the second request of its kind, and is made on consent of counsel for Defendants Havana Central NY 2, LLC and Jeremy Merrin (together, the “Defendants”).

Defendants’ counsel consented to the instant application, subject to the Court granting a temporary stay on discovery, to, through and including, the date of the telephonic conference. The undersigned consents to this request.

Thank you, in advance, for your time and consideration.

Respectfully submitted,

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

By: /s/ Jason Mizrahi

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*Attorneys for Plaintiff*

The application is granted.  
The conference is adjourned to  
June 29, 2023, at 3:30 p.m.  
The parties are free to suspend  
discovery in the meantime.

So Ordered.

  
GABRIEL W. GORENSTEIN  
United States Magistrate Judge

May 30, 2023

<sup>1</sup> The undersigned wishes to apologize for the slight delay in bringing the instant application.